

Planning Dept.
Arun Civic Centre
Maltravers Rd.
Littlehampton
BN17 5LF

7 PILGRIMS WAY
PAGHAM
PO21 3LF

Date: 6/4/19.

Dear Sir/Madam

Hook Lane P/30/19/OUT

I would like to object to the Council's plans to build a huge number of houses in and around Pagham.

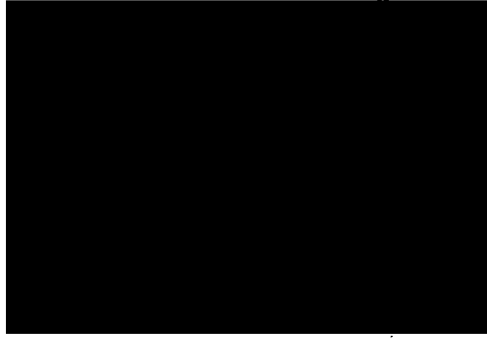
The reasons why these houses should not be built are numerous and obvious and I cannot believe that the Council have been so short sighted and keep ignoring the objections that have been made repeatedly by so many people. Local Councils are supposed to represent the views of local people and not take their instructions from central government which seems to be the case with ADG.

As has been pointed out many times the main reasons are - sewage works which cannot cope, problems with flooding, pressure on schools and doctors and hospitals, the huge increase in traffic which will inevitably happen will greatly reduce air quality and increase pollution.

In future could all planning meetings relating to Pagham please be held in the Village Hall in

~ Payham so that local people could attend
rather than in Littlehampton which ~~the~~ is too
far for many people to attend.

Yours Sincerely



ADC Planning

Civic Centre

Littlehampton

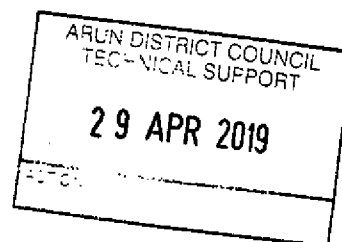
25th. April 2019

REF. P/30/19/OUT

20 Elbridge Crescent

Bognor Regis

PO21 4JQ



Abbreviations used :

LHA **Local Highway Authority**

WSCC **West Sussex County Council**

ADC **Arun District Council**

SDCC **Special Development Control Committee at ADC**

SRN **Strategic Road Network** **HE** **Highways England**

CDC **Chichester District Council**

PAGAM **Pagham & Aldwick Greenfields Action Movement**

Attached documents :

DOC 1 is PDF of WSCC to ADC ref : mitigation at junctions

DOC 2 is copy of article Bognor Regis Post criticism of CDC

**BOTH DOC 1 AND DOC 2 ARE AT THE END OF THIS
OBJECTION AND ARE PART OF THIS DOCUMENT**

Dear Sirs

I would like to put forward material considerations as well as anecdotal evidence as to why I believe the Hook Lane development should be refused for the second time, the first being in 1999 at a similar Inquiry hosted by a Government Planning Inspector. Even though in 1999 only 175 properties were being touted then the Inspector had noted that it could increase traffic issues onto an already overloaded country road.

The reason why this development was refused by Arun Development Control Committee members in 2019 was their deep concerns over the traffic volumes that would predictably increase when additional pressure was developed by these developments, particularly cumulative, as well as other factors you are well aware of.

The actual wording of the refusal at the SDCC on the 23rd. January 2019 was

'Increased vehicle movements generated by the application will exacerbate the capacity issues on the Local Highway Network and the mitigations measures proposed are insufficient to overcome the safety concerns resulting from the additional vehicle movements contrary to Policy T Sp1'

The developers have stated that they have complied fully with the Local Plan 2011-2031 on a strategic site (SD2 Pagham North) and therefore this should not have been refused hence the Inquiry being called into play. They state that a Independent RSA Stage 1 for P/6/17/OUT had been conducted by Wilbar Associates which although found many flaws in its original makeup were convinced by West Sussex County Council as the LHA that such problems could be ironed out after permission had been given.

After studying this document, I feel it should be dismissed as an evidence base due to the statement that was made in said document which had studied the underlying causes of accidents locally on the highway. This is Para 2.8 Page 4 and I quote ...

'As part of the Transport Assessment submitted for this proposal an analysis of the existing road traffic collision data in the surrounding road network was also undertaken. The conclusion from the TA collision analysis is summarised as follows "The review of the collision data indicates that there are no common patterns of collisions occurring that may be due to the characteristics of the local highway network. The causation factors are primarily carelessness on behalf of the drivers and/or pedestrians, indicating that the local highway network has no pre-existing inherent deficiencies. As such it is considered that the proposed development will not adversely affect the levels of incidents occurring in this area"

I have highlighted a part of this document that clearly shows a lack of understanding about the traffic movements in this area and a legally challenging statement where it clearly implies that accidents are primarily caused by carelessness by drivers or pedestrians. Perhaps the people who have been involved in accidents on this road should be presented as witnesses at the Inquiry to challenge such cavalier assumptions whilst also contemplating if they as individuals were guilty of negligence according to the sweeping statement made by this consultants document.

The assumptions seems to be that as the Local Plan 2011-2031 has just been adopted then that document gives an assertion that a development can be passed regardless as every conceivable possibility has been covered within its pages. This is simply not

true, the Local Plan will continue to be tested throughout its working life and will evolve eventually into a robust document which is highly questionable at the moment in certain areas.

If the ADC Planning Dept. were to carefully inspect the condition of the Pagham Rd., bearing in mind that it is an unclassified C road from Hook Lane to the Royal Oak Public House where it meets the B2166 from Bognor to Chichester, they would surely note severe damage to the edges of the road along its length to the Walnut Tree Public House at Mundham although the last 0.5 mile is better quality. This has been reported several times in the local press and is caused by the articulated lorries that frequent this road on their way to and from their destination, the packaging facilities at Barfoots just before the junction of Sefter Rd. These vehicles struggle to maintain a safe presence on their side of a narrow road due to their width so constantly churn up the edge of the tarmac creating dangerous ruts. As Barfoots operate a 'follow the sun philosophy' these issues are exacerbated by a large proportion of left hand drive vehicles coming in from Europe who cannot always judge such narrow roads.

Surely the ADC Planning Team were aware that WSCC had issued planning guidance to ADC that allowed the planning/operation fulfilment of a Packaging Centre at Barfoots to be approved with a proposed total movement capacity to and from of 40,000 vehicle movements a year (also reported in local press), outside of the local commuting traffic which can queue back to the Royal Oak public house or worse at times as a rolling road block. In the Summer we also have Church Farm Holiday Camp Pagham which welcomes thousands of holiday makers to its pleasures passing by the reference site on its way to Pagham (the end of the road) by St. Thomas A'Becket church. As an additive consideration is that Rose Green Rd. has seen a huge increase in vehicles at commute times 'rat running' down Rose Green Rd. out onto Pagham Rd. to avoid the rolling road block on the A259, the only other route into Chichester from Bognor Regis, Middleton on Sea, and further afield from the Northern Relief Rd.

WSCC has stated on many occasions that they can only elicit mitigation monies from developers to improve junctions on the Pagham Rd., but have also clearly stated that they have no intention of improving the actual Pagham Rd. itself so accidents will continue to happen, certainly some from the intimidation caused when a 40 ton articulated lorry is approaching you in poor weather conditions and they are not quite on their side of the road.

Further evidence over the lack of joined up thinking between ADC and WSCC is that WSCC submitted their report on the cumulative traffic assessments to ADC on the 27th. September 2017 yet it took 4 months to be made public knowledge on the ADC planning portal, i.e. 13th. February 2018. Ian Gledhill Principal Planner County Highways stated the following within the document with respect to the junction at the Royal Oak public house (a known accident black spot) **...see attached JPG for extract of document for clarification (Doc.1)**, that they had envisaged a small

roundabout at this junction but as there were ownership problems with land required, the £373,000 secured from developers could be better used in conjunction with other S106 monies to fund improving the A259 assuming that traffic would then avoid the Pagham Rd. Arun then commissioned a desktop study by DBA Associates in Scotland to clarify these junction problems. In complete contrast, DBA decided that simple signalisation at the Royal Oak junction would work and the same scenario might be repeated at the Sefton Rd. junction also. As LHA, why did Mr Gledhill ignore any other options and who do we take as the definitive supplier of the correct solution. It has also been noted that the West of Bersted development (2700 homes) would have an impact on the B2166 but was largely ignored in analysis as it is assumed traffic from the said development would use the Northern junction onto the A259, impacting on the SRN junction of the A259 to the A27 which is considered a severe junction.

As already stated, WSCC have no intention of improving the Pagham Rd. B2166, but ADC are co-promoting with WSCC over the advanced stages of planning a re-routed A29 from just North of the Rolls Royce development by the Northern Relief Rd. to a point exit opposite the Fontwell racecourse, then onto the Fontwell roundabout A27. This is advertised as solving the problems of traffic and HGV's exiting Bognor Regis, but in reality its sole purpose is to encompass a vast 3,000 home development SD5 (BEWS) planned on the inner side of this relief road with multiple roundabouts going into the said development. It is strange that WSCC et al are prepared to push nearly £60 million into such a scheme yet fail to understand that business traffic, particularly HGV's will still go West on the Northern Relief Rd. onto the A259/A27 as it is a shorter route as they push up to the Midlands or ferry ports. I also believe a traffic census will confirm that an overwhelming majority of HGV traffic will NOT use the Northerly A29, instead going West towards the ferry ports and/or the Midlands and if that traffic census was also undertaken on the Pagham Rd. it would confirm my previous statement. If SD3 were to go ahead then including the other strategic sites SD1 and SD2, we would have a combined total of approximately 3900 homes, easily surpassing the 3000 homes at BEWS so WHY is Pagham Rd. being ignored with respect to its inability to cope with such increased traffic loads i.e. mitigated S106 monies only available for junctions and not the road itself.

The whole purpose of this résumé is to bring reality into the problems posed here which cannot be addressed by desktop surveys, and developers hardly want to broadcast this image contrary to their implied view that their development could not possibly cause issues to the wider road network. There is a definite lack of joined up thinking between ADC, WSCC, and HE which is showing up at briefings held at DCC planning meetings in Littlehampton.

Further to my comments above, and a material consideration that is largely being ignored is the subject of air pollution caused by vehicles on the local highway network. I have taken the liberty of providing you with the exact transcript of the speech I gave (within the 3 minutes allowed for public speaking and was webcast)

which spoke out against the Sefter Rd. development P/134/16/OUT (a stone's throw away) but obviously the evidence stands for all developments that would use the Pagham Rd. to commute.

**SPEECH AT SDCC ARUN DISTRICT COUNCIL 13TH. NOVEMBER 2018 2.30PM.
SEFTER SLOT**

REPRODUCED FOR MEETING AT PAGHAM VILLAGE HALL 6TH. APRIL 2019

WSCC et al have stated that SD1, 2 & 3 plus the 130 allocated approved homes in the village as well as the projected 40000 yearly vehicle movements to and from Barfoots 24/7 .. mostly HGV 24/7 will have little impact on our road network. Tell that to the commuters stuck in traffic jams every day on their way to Chichester and the A27.

Air pollution from this traffic is supposedly covered in the Local Plan Policy QE DM3 Statement 'd' .

In Dec. 2016 the RAC Foundation published a report about traffic and air pollution, specifically NO₂ Nitrogen Dioxide and PM's 2.5 and 10 Particulate matter which is the major emission from diesel vehicles that contributes on average to 44,750 deaths annually with a impact on the economy of £25.3 billion pounds. NO₂ and PM's can contribute to a loss of life of 12 years (life expectancy) Deaths are indirect whereby a person with asthma or respiratory problems could have their life shortened by such pollution.

On 4th. April 2017 in the Guardian a report on air pollution and its effects had additively a statement by Chris Griffiths , Professor of Primary Care and Public Health at Barts and the London School of Medicine said "The research on exposure to traffic fumes and children's lung growth is pretty consistent. It shows that such exposures reduces lung growth, produces long term ill health and can cause premature death. We should be outraged that we are exposing our developing children to these obvious problems".

PAGAM have installed at various times diffusion tube air quality kits at obvious pinch points we all dread, the Coop at Rose Green Rd. (rat run heaven courtesy of Site 6/Bersted) the T Junction at the Royal Oak B2166/Pagham Rd. and finally North Mundham School with the S bend that slows down traffic producing higher emissions. All recorded figures were exceptionally close to the legal limit BEFORE all this additional development hits the roads.

In 2018 Chichester District Council produced an Air Quality Annual Status Report (ASR). No data appeared available for traffic flows past the school at North

Mundham at any time and it can be assumed that localised high levels of pollution will occur at specific times at the Free School as well.

Air pollution is not confined to cities and towns, it occurs at rural pinch points as mentioned above, and never forget car occupants are equally at risk.

Before these developments are allowed even at Outline planning level, air pollution should be robustly assessed by independent consultants (University of Brighton are conducting ground breaking research into this area and may be able to assist) as the risks far outweigh the profits that will be gleaned by developers. This is not scaremongering, this is reality ... the subject of research by leading Universities and hospitals which **MUST NOT** be ignored.

THERE IS NO JOINED UP THINKING BETWEEN ARUN DC, CHICHESTER DC, WSCC AND HIGHWAYS ENGLAND WHICH MUST BE ADDRESSED, CHICHESTER DC ARE BECOMING THE DUMPING GROUND FOR ARUN'S TRAFFIC ISSUES.

Plus I said to Councillor Bower (Chairman) 3 Mins. for people's lives but was shouted down !! **END OF SPEECH.**

The very same Councillor Bower as Chairman of the ADC DCC had the gall to attack CDC in an attachment (**DOC 2 JPG**) as reported in the Bognor Regis Post you may see fit to study which makes disturbing reading given that months previously a senior business planning manager at CDC Planning had warned ADC in no uncertain terms about the issues that were being created by the proposed developments being planned in Pagham and the damage it would do to CDC's strategic planning with respect to infrastructure (available to view on the ADC Planning Portal) No joined up thinking here either.

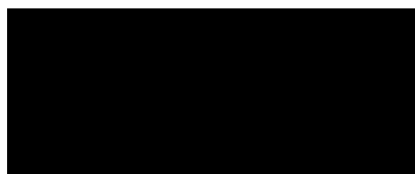
I also speak on behalf of the small school at North Mundham which is in the firing line of all these proposals. The developers and ADC will argue that this school is in CDC's domain and not their problem but ADC and WSCC should be under no illusions that this school could be given a severe at risk rating for its proximity to the B2166 (maybe 5m) at a pinch point where traffic queues regularly take place, and where speeding up/slowing down takes place, coupled with a set of pedestrian lights which exacerbate the situation. This is where the lack of joined up thinking is at its worst, certain focus groups have had to take it upon themselves to put up air diffusion tubes to harvest pollution levels and send them off to accredited laboratories for an analysis, and found the results dangerously close to the maximum allowed. It is one thing having European pollution maximums exceeded at Stockbridge Roundabout monitoring station but its a far more serious issue when such pollution takes place so close to a school i.e. North Mundham

When I presented this information in such a limited time frame I had assumed that as it involved children there would be a serious response from someone within the DCC or ADC. Councillor Bower Chairman did ask WSCC (Tim Townsend, compatriot

of Ian Gledhill)) for a comment which was **'I can't comment, not my area of expertise, maybe Environmental Health'** END OF. Did any Councillor on the SDCC query my statements to the Planning Officers .. NOT ONE. Did David Easton ADC, the Planning Officer for these developments feel this area should be looked into .. NO, did Neil Crowther the Group Head of Planning ADC feel that air pollution had not been robustly assessed .. NO. No one was interested. Councillor Bower seemed more interested in proposed facilities for electric vehicles than the research I had done. It is not my responsibility to have to undergo research more deeply into these matters, it is for WSCC and ADC to conduct far more extensive research or studies into these localised pinch points. Be reminded of the pinch point at the Coop shop Rose Green Rd. where there has been a massive increase in the volume of traffic that is now using this rat run route instead of the A259 due to its inherent problems. No road surveys have been done to clarify this. Drivers are now also using Hook Lane as an alternative to Sefter Rd. due to the dangers at this junction therefore increasing traffic flows along Hook Lane.

I hope that as a responsible Planning Authority who could be construed as being culpable for creating situations that damage children's well being, that they might feel obliged to consider what I have said is of grave concern not only to residents of Pagham but most notably that of North Mundham Parish Council and their small community focused school.

I believe accountability of a Planning Officer could be highlighted if such Officer in his Report to the DCC Committee does not make issue of the above air pollution considerations and should at the very minimum commission a study into the cumulative effect that these additional developments might have with respect to my findings. Failure to comply would indicate that ADC have absolutely no respect for world class experts in these fields and even less respect for children's health, perhaps David Easton, Karl Roberts or Neil Crowther might consider sending their children to this small village community school if they are so sure of their planning decisions.



Yours Sincerely Mr. A. J. Pivett

DOCUMENT 1 Extract from email Gledhill WSCC to ADC

27TH. SEPTEMBER 2017 PUT ON PORTAL 13TH FEBRUARY 2018

TITLE : WSCC COMMENTS ON CUMULATIVE TAs PAGHAM

Similar to the Pagham Road/Sefton Road junction, there is a degree of variability in terms of the forecast operation of the junction, particularly in the PM peak. Taking account of the development traffic, the increase in delays are quite notable. Due to land ownership constraints there is though a limit upon what meaningful improvements are possible and can be delivered at the Lower Bognor Road junction by the various developers. Again, it is acknowledged that the development is not the sole reason for the capacity issues. It is expected that the majority of traffic using the Lower Bognor Road in the base situation is doing so as an alternative to using the A259. The A259 is known to be congested at peak times especially where it meets the A27.

In order to address the above points, a contribution is being offered towards local highway improvements. This contribution is based upon the cost of constructing a potential roundabout junction improvement; an obligation could not be put upon the

COUNCIL PR40216/OUT

developer to construct these works given that 3rd party land is required. The contribution will therefore be used alongside those sought from other developments towards capacity improvements in the wider area. These most likely will include works along the A259 corridor towards Chichester. The undertaking of such works should then encourage less traffic to use alternate routes to the A259. Alternately the contribution may be used towards improvements at the Pagham Road/Lower Bognor Road junction should WSCC obtain the necessary land.

Whilst the impacts at this junction are recognised, it's considered that the securing of a contribution of £373,000 is reasonable and proportionate in overcoming any severe residual cumulative impacts arising from the development.

**DOCUMENT 2 COUNCILLOR BOWER COMMENTING IN BOGNOR POST
THAT ITS ALL CDCs FAULT WE HAVE THESE PROBLEMS.**

Criticism of plan for Chi

CALLS have been made for help to improve major roads around Bognor Regis.

The need for Chichester District Council to do more to ease traffic access to the city from the town was highlighted by its Arun counterpart.

The draft local plan for Chichester envisages using a projected benchmark of 2035/36 as the model for improvements to infrastructure, such as roads.

But Cllr Ricky Bower, Arun District Council's planning policy sub-committee chairman, said: "I don't think people can wait until 2035 given the operational issues the A259 is under. It is full on a daily basis between Bognor Regis and Chichester.

"Putting more housing in the Chichester district will impact on the A259 and I can't understand from their point of view. They have got their housing together but the infrastructure is going to have to go along with it.

"In order to address some of these matters, there is going to have to be a plan. I don't know what their infrastructure plan is yet.

"We have major issues in the west of the district with Pagham Road and the A259. We have got to make sure Chichester gets the message that their infrastructure in this area has got to be deliverable on their issues and it has to help us on ours.

"That's the point I would make and this is the only opportunity we have got to put as much pressure on Chichester to ensure their infrastructure meets the

expectations of those who live in the Arun district."

He said the Highways Agency's response to the situation on Pagham Road was to install traffic lights 200-300 yards before the A259's Bognor roundabout to enable traffic from Pagham to pull out. But this was dismissed by councillors as being unsuitable.

"The solution to the Pagham Road problem is the diversion of Vinnetrow Road so it joins the A259 at the Drayton roundabout. We should be seeking to push that as much as we can. I don't know how we can do that with regard to this local plan consultation," he said.

"But we have got to put as much pressure on Chichester to deliver on that infrastructure by any means necessary."

Arun's cabinet member for planning, Cllr John Charles, the sub-committee's vice-chairman, said: "Chichester seem quite determined to close that road up from Pagham.

"The traffic lights there would see traffic queuing up on to the start of the A259. If they close that road from Pagham, nothing will happen. People will die there. They will not be able to move anywhere."

The sub-committee agreed to conditionally back Chichester's local plan subject to six conditions.

These include justifying having more homes than jobs and the effect that will have on commuting and bringing in trigger mechanisms to ensure infrastructure was built at the right times.